



# Counter Fraud, Bribery and Corruption Policy

Date approved: 9 February 2024  
Approved by: SMT  
Responsible Manager: Financial Controller  
Executive Lead: Vice Principal Finance, Planning and Facilities

Applicable to staff: Yes  
Applicable to students: Yes  
Accessible to students: Yes  
Accessible to general public:  
(including clients) Yes

## Consultation

Consultation undertaken with:		Date:
• SMT	Yes	09 February 2024
• AMT	Yes	09 January 2024
• CCMT	Yes	10 January 2024
• Student Union	Yes	15 December 2023

Policy review frequency: Every 2 years

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## **1. Scope and purpose of the policy**

- 1.1 The purpose of this policy is to set out B&FC's stance on fraud, bribery and corruption and its approach to preventing, detecting, reporting and investigating fraud, bribery and corruption.
- 1.2 This policy is applicable to, and must be followed by its suppliers, students, partners, contractors and agents.
- 1.3 This policy applies to all separate legal entities owned or controlled by B&FC.

## **2. Policy statement**

- 2.1 B&FC has a 'zero tolerance' policy towards fraud, bribery and corruption. This means that B&FC:
  - a) does not accept any level of fraud, bribery or corruption within the organisation, by any individual or organisation receiving B&FC funds or representing B&FC; and
  - b) will always seek to take appropriate disciplinary and/or legal action against those found to have perpetrated, be involved in, or assisted with fraudulent or other improper activities in any of its operations.
- 2.2 B&FC is committed to maintaining an anti-fraud culture and keeping the opportunities for fraud, bribery and corruption to the absolute minimum.
- 2.3 B&FC requires all employees to act honestly and with integrity at all times and to safeguard the resources for which they are responsible. Failure to comply could result in criminal, civil and/or disciplinary action.
- 2.4 B&FC requires all those receiving B&FC funds or representing B&FC, including its suppliers, students, partners, contractors and agents, to act in accordance with this policy.
- 2.5 B&FC is committed to conducting business fairly, openly and honestly and in accordance with the highest ethical and legal standards.
- 2.6 B&FC complies with all applicable legislation, including the Fraud Act 2006, the Bribery Act 2010, and with other regulatory requirements and applicable guidance. Since November 2022 B&FC was reclassified as a central government organisation and as such must also comply with the Treasury guidance '[Managing Public Money](#)'. Within The Code of Conduct on Public Interest Disclosure the Board of B&FC establishes and promotes the highest standards of probity within B&FC and commits itself to eliminating fraud, corruption and malpractice.

### **3. Accountability**

The Financial Controller is responsible for keeping the policy up to date in line with all legal requirements and guidance.

### **4. Student Involvement**

Not applicable.

### **5. Linked Policies**

- Financial Regulations
- Employee Public Interest Disclosure Policy
- IT and Information Security Policy
- IT Systems Acceptable Use Policy
- Cyber Security Policy
- Clear Desk and Clear Screen Policy
- Recruitment Policy
- Curriculum policies. Exams.
- Overseas students. Visa support
- Student Support policies/procedures. Bursary, discretionary grants.
- Managing Public Money

### **6. Linked procedures**

- Financial Policy and Procedures, including:
  - Anti Money Laundering procedure
  - Gifts and Hospitality procedure and register
- Employee Public Interest Disclosure Procedure
- Registered Conflicts of Interest

### 3. Impact Assessment

Impact Assessment for the 4 strands of Equality, Safeguarding, Health and safety and Sustainability				
Initial Form to be completed with Risk Assessments or as part of a proposal or change to a policy, plan or new way of working				
Title of Activity: Counter Fraud Bribery and Corruption Policy Name and title of proposer: Steve Yeoman – Financial Controller				<input type="checkbox"/> New or <input checked="" type="checkbox"/> Revision (tick as appropriate)
<b>Equality and Diversity.</b> Are there students, apprentices, other customers, community/stakeholders, and/or colleague concerns that the proposed policy, project or change may be discriminatory or have an adverse impact on people with protected characteristics?				
A	Students/Apps/Customer	No	If so, how many individuals / which groups of are likely to be affected?	N/a
B	Community/stakeholders	No		
C	Colleague	No		
Equality group	Positive impact High Low None	Negative impact High Low None	Reason / comments for positive impact why it could benefit any /all of the equality groups	Reason /comments for negative impact /what could disadvantage any/ all of the equality groups
Sex	None	None		
Gender reassignment (Male/ female/ Non-binary/ Transgender)	None	None		
Age	None	None		
Race or ethnicity	None	None		
(Disability) Learning difference	None	None		
(Disability) Physical and/or sensory	None	None		
(Disability) Mental health need	None	None		
Sexual Orientation	None	None		
Religion and Belief	None	None		
Marriage and civil partnership	None	None		
Pregnancy and maternity	None	None		
Carers/care experienced	None	None		
Socio Economic deprivation indicators	None	None		
What changes or actions do you recommend to improve the service, project, policy, or change to eradicate or minimise the negative impacts identified? Who will be responsible for monitoring these actions?				
Have students, apprentices/other customers, communities and/or colleagues been consulted in the review / proposed change? Student Union – Yes.				
A	Students/Apps/Customers	Yes		
B	Community	No		
C	Colleague	Yes		
	If yes, who and how many have you involved and how have they been involved?	The Policy/Procedure has been reviewed by Student Union, AMT, CCMT. Final approval is required to come from SMT.		
<b>Safeguarding:</b> Are there any aspects of this proposal which could cause a Student/member of staff/visitor to feel unsafe? If yes, how has this been considered? What are the risks? What are the benefits?				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Health and Safety:</b> Have any risks been identified? If yes, how has this been considered? What are the risks? What are the benefits?				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

<b>Sustainability:</b> Are there expected benefits or impacts on sustainability issues? If yes, how have these been considered?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>Evidence:</b> What evidence do you have for your conclusions and expectations for these conclusions? How will this impact be monitored for all these considerations?	N/a
Is this policy of a high/medium or low risk?	<input type="checkbox"/> High <input type="checkbox"/> Medium <input checked="" type="checkbox"/> Low